

REMARKS

Applicant respectfully requests reconsideration of this application, as amended, and reconsideration of the Office Action mailed May 19, 2004. Upon entry of this amendment, claims 1-22 remain pending in this application. The amendment is supported by the specification and does not add any new material.

In the specification, the Abstract has been amended per the Examiner's reminder.

Claims 6, 12 and 21 are acknowledged as allowable if rewritten in independent form.

Claims 1-5, 7-11, 13-20 and 22 stand rejected under 35 U.S.C. §103 as obvious over U.S. Pat. No. 6,065,043 to Domenikos et al. in view of U.S. Pat. No. 6,052,120 to Nahi et al. Applicant respectfully traverses this rejection as the cited references do not disclose or suggest any system or method for using a control-based protocol with a thin-client device to run a remote dedicated application.

Claims 1-5 are directed to a "thin-client device" communicating with a remote dedicated application by a control-based protocol that enables the application to run remotely. Accordingly, the claims include the limitation of the thin-client device including "dedicated client means interpreting messages received from said server computer and generating messages recognizable by said server, said messages sent between said server computer and said client device conforming to a control-oriented protocol that restricts message communication to only messages describing certain preselected events associated with the dedicated application." Domenikos et al. provides no disclosure for a thin-client device that generates messages that conform to a control-oriented protocol and are restricted to preselected events.

Instead Domenikos et al. '043 teaches a client-server system in which the client must download applications or portions of executable code to the local memory of the client. *See Domenikos et al. '043 at col. 7, line 59 to col. 8, line 4.* Thus the Domenikos et al. system teaches directly against the purposes of the present invention. The claimed invention specifically

avoids the necessity of downloading application files or portions of executable code, and permits remotely running the application through the use of a control-oriented protocol and communication messages restricted to preselected events.

Applicant respectfully traverses the Examiner's citation to the Abstract and cols. 8-10 of the Domenikos et al. reference, as the same do not disclose the limitation of claims 1-5 of a dedicated client means generating messages that conform to a control-oriented protocol restricting message communication to preselected events associated with the dedicated application. The cited passages relate only to "access rules" for allowing a client to access particular "links" to remote applications for download and running on the client. *See e.g., col. 9, line 49 to col. 10, line 15.* Domenikos et al. is clearly limited to systems where the application code must be downloaded to run locally on a non-thin client device. As a result, no control-oriented messaging protocol is even contemplated for a "dedicated application." In this regard, the Examiner also acknowledges that Domenikos et al. does not relate to a system for use with thin-client devices.

Where Domenikos et al. does not concern thin-client devices and requires application files/code downloading to a client, the reference neither teaches or suggests the inventive element of dedicated client means for interpreting and generating messages conforming to a control-oriented protocol exchanged with a remote server running the dedicated application. Accordingly, those skilled in the art understand that the Domenikos et al. disclosure provides no motivation to arrive at a control-oriented protocol restricting message communication to events associated with the dedicated application between the server and a thin-client.

The Nahi et al. reference, alone or in combination with Domenikos et al., also does not provide any teaching or suggestion of the limitation of "dedicated client means interpreting messages received from said server computer and generating messages recognizable by said server, said messages sent between said server computer and said client device conforming to a

control-oriented protocol that restricts message communication to only messages describing certain preselected events associated with the dedicated application." Instead, Nahi specifically teaches away from systems utilizing a "dedicated application" and "dedicated client means" as stated in col. 4, lines 39-42 of the '120 patent : "As such, the portable display tablet has essentially no processing requirement that are specific to any particular application executed by the base computer system." Those skilled in the art will appreciate that where the claimed invention includes "dedicated client means" for interpreting and generating messages based on preselected events associated with the particular "dedicated application," Nahi et al.'s disclosure is incompatible with the purposes and claims of the present invention.

In this regard, Applicant respectfully notes that Nahi et al. '120 is limited to teaching a "display-oriented" control protocol as clearly distinguished throughout Applicant's specification. *See e.g. page 25, lines 3-19 of Applicant's specification.* Specifically, at col. 18, lines 21-30 of the '120 patent, Nahi et al.'s system includes an "input event module **178** receives and processes keyboard, pointer and touch screen input information into a corresponding set of inbound input event messages that are forwarded ultimately to the event input multiplexer module **148**." As shown in FIG. 7 of Nahi et al. '120, the input event module **178** is resident on the thin client and simply passes all keyboard, point and touch screen inputs to the input event multiplexer module **148** at the server. By contrast, the claimed invention includes dedicated client means that conforms messaging to a control-oriented protocol and restricts communicated messages to preselected events so that, for instance, all inputs need not be communicated to the server as in the display-oriented protocol of Nahi et al.

As neither of the cited prior art references either alone or in combination suggest a system that includes the limitation of amended claims 1-5 of dedicated client means for generating messages conforming to a control-oriented protocol and restricted to preselected events associated with the dedicated application, Applicant requests the examiner's rejection under 35 U.S.C. §103 be withdrawn.

For the foregoing reasons, Applicant similarly requests that the Examiner's rejection under 35 U.S.C. §103 to claims 7-11, 13-20 and 22 be withdrawn, as the Examiner states that claims 7 (from which rejected claims 8-11 and 13-17 depend) and 18 (from which rejected claims 19-20 and 22 depend) do not define new limitations over claims 1-5.

Specifically, amended claims 7-11 and 13-17 include the steps of "at said thin-client device generating a message descriptive of a preselected event recognizable by said application as indicative of a certain application control", "excluding data representative of user action performed in operation of said associated application control but not representative of said preselected event" and transmitting said message to said server. As set forth in the foregoing arguments, neither of the cited references, either alone or in combination, teach or suggest these limitations.

In summary, Domenikos et al. '043 requires application code to be downloaded to a client, and therefore does not relate to thin-client devices or application control messaging between the client and a server. Further, Nahi et al. '120 discloses display-oriented protocol that is not based on a "dedicated application" and does not teach or suggest "application control" messages that excludes data not representative of a preselected event. As previously set forth, Nahi et al. '120 instead teaches against the present invention by disclosing the sending of all inputs from the client device, without selective exclusion, to the server.

Similarly, amended claims 18-20 and 22 include the limitation of interfacing a thin-client device with a dedicated application executable on said server and restricting client communications of an application control to only significant events. Domenikos et al. does not teach a dedicated application executable on a server, the use of a thin-client device, or selective application control messaging between a client and server (since the application is not executed on the server). Nahi et al. does not teach the restriction of application controls to significant

events, as Nahi et al.'s disclosure is limited to display-oriented control where all inputs are passed to the server and are not dependent on a "dedicated application."

Furthermore, Applicant notes that Domenikos et al. and Nahi et al. not only fail to disclose a control-oriented messaging protocol providing selective communication of messages from a thin-client device to a server running a dedicated application, but are incompatible teachings to attempt to combine to arrive at the present invention. In particular, as Domenikos et al. teaches a system for downloading application code to run on the client and Nahi et al. teaches remote running of an application with a display-oriented protocol, the functions of the systems directly conflict one another.

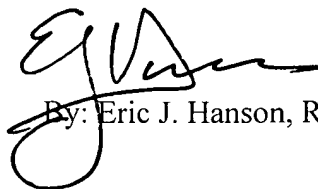
As the present invention specifically seeks to both avoid downloading the executable application code to run the application in client memory (Domenikos et al.) and using display-oriented protocol (Nahi et al.), those of ordinary skill in the art would appreciate that there is no motivation to arrive at the claimed invention by combination of such references. Accordingly, Applicant submits that the invention of claims 1-5, 7-11, 13-20 and 22 is non-obvious and patentable over these references both individually and in combination.

In view of the foregoing, applicants request that a timely Notice of Allowance be issued in this case.

If any additional fees are due in connection with the filing of this amendment or the accompanying papers, please charge the fees to SGR Deposit Account No. 02-4300, Order No. 040922.0021. If an additional extension of time under 37 C.F.R. §1.136 is necessary that is not accounted for in the papers filed herewith, such an extension is requested. The additional extension fee should be also charged to SGR Deposit Account No. 02-4300, Order No. 040922.0021. Any overpayment can be credited to Deposit Account No. 02-4300, Order No. 040922.0021.

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Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Eric J. Hanson', written over the printed name.

By: Eric J. Hanson, Reg. No. 44,738

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